

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA

v.

HAROLD BROOME, JR.,

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DOCKET NO.: 3:19-CR-384

FACTUAL BASIS

NOW COMES the United States of America, by and through William Stetzer, Attorney for the United States pursuant to 28 U.S.C. § 515, for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a “Statement of Relevant Conduct” pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government’s “Statement of Relevant Conduct” within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. In 2019, the Charlotte Mecklenburg Police Department (CMPD) and Bureau of Alcohol, Tobacco and Firearms (ATF) investigated and later arrested Defendant Harold Broome, Jr., (Defendant), for conspiring to distribute and possessing with intent to distribute cocaine. Defendant sold narcotics in the greater Charlotte, NC community, and was arrested in April 2019 with bulk powder cocaine inside his residence. On April 11, 2019, CMPD Officers arrested the Defendant, and his co-conspirator, inside his Charlotte, NC residence in possession with intent to distribute over 5 kg powder cocaine, and over 2 pounds marijuana. The Defendant conspired with his girlfriend, among others, to distribute these narcotics. On January 06, 2020, Defendant Harold Broome was again arrested in possession with intent to distribute approximately 86 grams powder cocaine, 30 grams crack cocaine and 81 grams marijuana. The narcotics were stored inside his new residence. The Defendant’s involvement in this drug trafficking conspiracy lasted throughout 2019 and into 2020.

2. The defendant, Harold Broome, Jr., from in or about 2019, to on or about January 06, 2020, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, did knowingly and intentionally conspire and agree with other persons, known and unknown to the Grand Jury, to distribute and to possess with intent to distribute a controlled substance, that is a mixture and substance containing five (5) kilograms or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

3. Before the defendant, committed the offenses charged in Count One, the defendant had a final conviction for a serious drug felony, namely, a conviction under Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, in violation of Title 21, United States Code, Sections 841(a)(1), 851 and 846.

WILLIAM STETZER
ATTORNEY FOR THE UNITED STATES
PURSUANT TO 28 U.S.C. § 515

s/ Sanjeev Bhasker

Sanjeev Bhasker
Assistant United States Attorney

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Superseding Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Superseding Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.


Rob Heroy, Attorney for Defendant

DATED: 7/14/20